



217/782-6762

Refer to: 1671205030 -- Sangamon County  
Industrial Chemical  
ILD980702617  
Compliance File

COMPLIANCE INQUIRY LETTER

Certified # *1671205030*

January 29, 1987

Industrial Chemical  
2160 E. Enterprise Avenue  
Springfield, Illinois 62702

EPA Region 5 Records Ctr.



335334

Dear Mr. Thompson:

The purpose of this letter is to address the status of the above-referenced facility in relation to the requirements of 35 Ill. Adm. Code, Part 725 and to inquire as to your position with respect to the apparent violations identified in Attachment A and your plans to correct these apparent violations. The Agency's findings of apparent non-compliance listed in Attachment A are based on a January 21, 1987 review of documents submitted to the Agency to demonstrate compliance with the requirements of 35 Ill. Adm. Code, Part 725, Subpart G.

Please submit for approval within fifteen (15) calendar days of the date of this letter your closure certification. This document should be sent to the following:

Harry A Chappel, P.E., Acting Manager  
Facilities Compliance Unit  
Compliance Monitoring Section  
Illinois Environmental Protection Agency  
Division of Land Pollution Control  
2200 Churchill Road  
Post Office Box 19276  
Springfield, Illinois 62794-9276

Until your facility is formally closed, you remain subject to all applicable requirements of 35 Ill. Adm. Code, Part 725, Subpart H.



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Further, take notice that non-compliance with the requirements of the Illinois Environmental Protection Act and rules and regulations adopted thereunder may be the subject of enforcement action pursuant to either the Illinois Environmental Protection Act, Ill. Rev. Stat., Ch. 111 1/2, Sec. 1001 et seq. or the federal Resource Conservation and Recovery Act (RCRA), 42 U.S.C. Sec. 6901 et seq.

If you have any questions regarding the above, please contact Rob Watson at 217/782-6762.

Sincerely,

Harry A. Chappel, P.E., Acting Manager  
Facilities Compliance Unit  
Compliance Monitoring Section  
Division of Land Pollution Control

HAC:WRW:rd1346g/27-28

cc: Division File  
Central Region  
Ruth Allen  
USEPA -- Mary Murphy /  
Virginia Yang  
Chris Zeman, Attorney General's Office  
Rob Watson  
Geordie Smith



1. Pursuant to 35 Ill. Adm. Code 725.213(b), the owner or operator must complete closure activities in accordance with the approved closure plan and within 180 days after receiving the final volume of wastes or 180 days after approval of the closure plan, if that is later. The Director may approve a longer closure period using the procedures under Section 725.212(c) if the owner or operator demonstrates that:
  - 1) A) The closure activities will, of necessity, take him longer than 180 days to complete; or
  - B) 1) The facility has the capacity to receive additional waste;
  - 11) There is a reasonable likelihood that a person other than the owner or operator will recommence operation of the site;
  - 111) Closure of the facility would be incompatible with continued operation of the site; and
- 2) He has taken and will continue to take all steps to prevent threats to human health and the environment from the unclosed but inactive facility. Comment: Under paragraphs (a)(1)(B) and (b)(1)(B) of this Section, if operation of the facility is recommenced, the Director may defer completion of closure activities until the new operation is terminated.

You are in apparent violation of 35 Ill. Adm. Code 725.213(b) for the following reason(s): You have failed to provide documentation that you have closed the facility within 180 days of the approved closure plan dated June 17, 1986.

2. Pursuant to 35 Ill. Adm. Code 725.215, when closure is completed, the owner or operator must submit to the Director certification both by the owner or operator and by an independent registered professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan. You are in apparent violation of this Section for the following reason(s): The addition of the 30 days for certification of closure, allowed under item no. 1 of the approved closure plan, and the 180 days for closure required under Section 725.213(b), yield a closure certification due date of January 13, 1987. As of the date of this letter the Agency has not received a certification of closure from the above referenced facility.

GDS:rd1346g/29